

EXHIBIT D

ORIGINAL

1

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In re Application of x
READING BROADCASTING, : MM DOCKET NO. 99-153
INC., : FILE NO. BRCT-940407KF
For Renewal of License :
of Station WTVE (TV), :
Channel 51, :
Reading, Pennsylvania, :
and :
ADAMS COMMUNICATIONS : FILE NO. BPCT-940630KG
CORPORATION, :
For Construction Permit. x

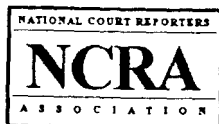
Washington, D.C.

Friday, November 12, 1999

TELEPHONE DEPOSITION OF:

MILTON PODOLSKY,

a witness, was called for examination by counsel for
Reading Broadcasting, Inc., pursuant to Notice and
agreement of the parties as to the time and date,
taken at the offices of Holland & Knight, 2000 K
Street, N.W., Washington, D.C., commencing at
10:45 A.M., Friday, November 12, 1999, before



**CAROL J. THOMAS STENOTYPE
REPORTING SERVICES, INC.**
3162 MUSKET COURT
FAIRFAX, VIRGINIA 22030
(703) 273-9224

1 Elaine A. Merchant, a Registered Professional
2 Reporter and Notary Public in and for the District
3 of Columbia, when were present on behalf of the
4 respective parties:

5

6 APPEARANCE OF COUNSEL:

7 For Reading Broadcasting, Inc.:

8 HOLLAND & KNIGHT, ESQUIRES
9 BY: THOMAS J. HUTTON, ESQUIRE
10 2100 Pennsylvania Avenue, N.W., Suite 400
Washington, D.C. 20037-3202

11

For Adams Communications Corporation:

12

13 BECHTEL & COLE, ESQUIRES
14 BY: HARRY F. COLE, ESQUIRE
15 1901 L Street, N.W., Suite 250
Washington, D.C. 20036

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I-N-D-E-X

18 Witness:

Page:

19 MILTON PODOLSKY (via telephone)

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Examination by Mr. Hutton

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1 THEREUPON,

2 MILTON PODOLSKY,

3 called as a witness, and after having been duly
4 sworn, testified as follows:

5 EXAMINATION

6 BY MR. HUTTON:

7 Q Mr. Podolsky, would you state your name
8 and address for the record?

9 A Milton Podolsky.

10 Do you want the permanent residence?

11 Q Yes, please.

12 A Or where I am now?

13 Q Permanent residence, please.

14 A 17763 Deauville, D-E-A-U-V-I-L-L-E, Lane,
15 Boca Raton, Florida 33496.

16 Q Mr. Podolsky, because we're operating on
17 a speaker phone, there may be times when you can't
18 understand me correctly. Or I just may ask a
19 question you don't understand. In either event,
20 please feel free to ask me to restate the question
21 or rephrase the question.

22 And if Mr. Cole states an objection to

1 any of my questions, please wait until we've
2 resolved the issue before responding to the
3 question.

4 And if you need to take a break at any
5 time, feel free to ask for a break and we can resume
6 at your convenience.

7 What position do you hold with Adams
8 Communications?

9 A A limited partnership.

10 Q I think Adams is a corporation.

11 A Then I'm an investor.

12 Q Do you know if you're an officer or
13 director?

14 A I am not an officer or director. That I
15 would know.

16 Q Do you know approximately what your stock
17 interest is?

18 A Approximately about 7 percent.

19 Q And how was that percentage arrived at?

20 A If I recall correctly, that's what Bob
21 Haag said he had for me.

22 Q When were you first approached about

1 joining Adams Communications?

2 A I can't tell you the time when they first
3 organized or I guess when they decided to proceed.
4 Time is very bad right now with me. It's got to be
5 years, two years, three years.

6 Q I understand.

7 Just for frame of reference, the
8 application was filed in June of 1994.

9 A Honest to God?

10 Q What's that?

11 A I said honest to God?

12 Q Yeah.

13 A I guess whenever they called for --
14 whenever they started up the partnership, when they
15 called me up and said would you like to join us.
16 That's the day I started. So whenever they did
17 that, that would be it. But I honestly can't give
18 you that.

19 Q And what did they tell you about why they
20 were forming Adams Communications?

21 A They asked me if I would like to go into
22 an investment. I don't know if it was an investment

1 even. Into a deal with them. That they had 7
2 percent for me. And I said yes. At that time, I
3 don't even think I knew what the name was. That's
4 the way we all are.

5 Q We've been using they and we?

6 A We is me, Milton Podolsky. They is I
7 generally talk about Haag and on occasion Howie
8 Gilbert, but that's it.

9 Q And what was described as the purpose of
10 Adams Communications or the new entity that was
11 being formed?

12 A Pardon me?

13 Q What was described as the purpose of the
14 new entity that was being formed?

15 A I don't know. I really don't know. At
16 that time?

17 Q Yes.

18 A At that time, I don't think I was told
19 anything except that they were proceeding. I don't
20 recall. I don't think there was anything. They
21 just asked me if I wanted to join.

22 Q But join what?

1 A A group.

2 That's a good question.

3 I guess it was concerned about the public

4 air rights of the people.

5 Q Which people?

6 A Who knows what people. The public.

7 Q The public where?

8 A The public that would listen to those

9 stations.

10 Q Which stations?

11 A I have no idea.

12 Q Do you know if they were talking about --

13 A You're asking me things I don't remember

14 because I don't think we had all these

15 conversations.

16 Q Well, you agreed to invest in a company

17 with them?

18 A Right. And they invest in real estate.

19 I didn't go through the whole package. They said

20 we're going to buy a building, do you want to join

21 us.

22 Q All right. But at least in that case you

1 would know you were going to buy a building. Do you
2 know what the new group --

3 A I'm not too sure that I knew that we were
4 buying something as much as we were interested in
5 the fact that there certainly was a lack of -- what
6 is the right word -- responsibility to use the air
7 rights for the proper causes. And that's about all
8 I can tell you because that makes sense.

9 Q And why was that a matter of interest or
10 concern to you?

11 A I don't know.
12 Do that again.

13 Q What's that?

14 A Do that again.

15 Q Why was that a matter of interest or
16 concern to you?

17 A Because Bob Haag was going into it solely
18 and purely. Whether it was specific duty or
19 operations or whatever he wanted to do, I would join
20 him.

21 Q And did you agree to join based on your
22 past experience with Mr. Haag?

1 A I don't think so. My past experience
2 with him as an individual with everything we did,
3 with our relationship?

4 Q Well, no, I was referring --

5 A You've got to be specific.

6 Q Okay. I'm sorry.

7 Did you decide to invest with him in the
8 new venture based on a previous past experience in
9 the television business?

10 A I might have. I'm not sure what I
11 thought about at the time. I just knew that he was
12 going into it. I don't even think I thought that
13 was a great investment at that time as much as it
14 was a great cause.

15 Q And when did you first learn that the
16 company intended to apply for a station in Reading,
17 Pennsylvania?

18 A I don't know. When he called me. You're
19 asking for dates I can't give you. That's
20 repetition. I don't have a date for you.

21 Q I understand you don't have a date.

22 A When he called me. Whenever that was.

1 Q In the first call, Reading, Pennsylvania
2 was mentioned; is that correct?

3 A I'm trying to think. I don't think I had
4 a lot of calls with him. That's a long time ago and
5 it was all verbal. I guess he would have mentioned
6 it.

7 Q Do you recall if he mentioned any other
8 possible locations?

9 A No, he did not, that I know of.

10 Q Did he ever share a business plan with
11 you?

12 A No.

13 Q Did anyone associated with Adams
14 Communications ever share a business plan with you?

15 A Are you talking about in writing or
16 verbally?

17 Q Well, let's cover first in writing and
18 then verbally.

19 A In writing, no. And verbally, no.

20 Are you talking about at the beginning?

21 Q At any time.

22 A A week ago.